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Attorneys for Defendant PACIFIC GAS AND ELECTRIC  
COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
PACIFIC GAS AND ELECTRIC COMPANY,  
  
Defendant.

Case No. 14-CR-00175-WHA

**ADMINISTRATIVE MOTION OF  
PACIFIC GAS AND ELECTRIC  
COMPANY TO FILE UNDER SEAL  
PORTIONS OF RESPONSE TO  
REQUEST FOR FOLLOW UP BY  
PG&E CONCERNING ITS  
OCTOBER 26 SUBMISSION**

Judge: Hon. William Alsup

1 Pursuant to Criminal Local Rule 56-1, Pacific Gas and Electric Company (“PG&E”)  
2 respectfully submits this Administrative Motion to File Under Seal (the “Administrative  
3 Motion”).

4 PG&E makes the following statement in support of its Administrative Motion:

5 1. Counsel for PG&E has reviewed and complied with Civil Local Rule 79-5 and  
6 Criminal Local Rule 56-1, which require that if a document or portion thereof is sealable,  
7 counsel seeking to file the document or portion of the document under seal must file and serve an  
8 administrative motion for a sealing order, accompanied by a declaration establishing that the  
9 materials are sealable.

10 2. PG&E seeks to file under seal redacted portions of Exhibits 1 and 2 and the  
11 entirety of Exhibit 3 to the Declaration of Kate Dyer in Support of PG&E’s Administrative  
12 Motion to File Under Seal (the “Dyer Declaration”), which correspond to Exhibits A, B and C to  
13 PG&E’s Response to Request for Follow Up by PG&E Concerning its October 26 Submission,  
14 respectively. Specifically, PG&E seeks to seal for safety reasons the names, job titles and roles  
15 of the PG&E employees identified in Exhibit 3, and the names of the declarants in Exhibits 1 and  
16 2.

17 3. Criminal Local Rule 56-1 provides that a sealing order may issue where  
18 information, if made available to the public, would compromise the safety of a person. *See*  
19 Criminal Local Rule 56-1(b) and Commentary.

20 4. PG&E believes that the safety of the PG&E employees and the safety of their  
21 family members could be compromised if their names, job titles, and roles are made publicly  
22 available as part of the PG&E Response.

23 5. As set forth in the Dyer Declaration, PG&E has observed a dramatic increase in  
24 the number of workplace violence events from customers towards employees, including during  
25 PSPS events. In addition, PG&E executives who have spoken publicly on behalf of PG&E with  
26 respect to its wildfire mitigation efforts have received death threats.

1 Dated: November 18, 2020

Respectfully Submitted,

2 JENNER & BLOCK LLP  
3 Reid J. Schar (*pro hac vice*)

4 CRAVATH, SWAINE & MOORE LLP  
5 Kevin J. Orsini (*pro hac vice*)

6 CLARENCE DYER & COHEN LLP

7 By:

8   
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10 AND ELECTRIC COMPANY  
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